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*Attorneys for Debtors and Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case, No.  
19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF MICHAEL SOSINSKI  
IN SUPPORT OF PG&E'S MEMORANDUM  
OF POINTS AND AUTHORITIES IN  
OPPOSITION TO CLAIMANT'S SECOND  
MOTION FOR PARTIAL SUMMARY  
JUDGMENT**

Date: December 19 2023

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Only)

United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

**DECLARATION OF MICHAEL SOSINSKI**

I, Michael Sosinski, declare as follows:

1. I am employed as a Senior Manager with the Transmission Line Engineering Department of Pacific Gas and Electric Company (PG&E). My role is to oversee all modifications to the PG&E electrical grid. I received a bachelor's degree in civil engineering from Rutgers University in 1981. I am a Civil Engineer licensed by the California Board for Professional Engineers, Land Surveyors and Geologists, License Number 77582.

2. I began working at PG&E in May, 2014. I have held different positions with PG&E, most recently working as an engineer leader on electric transmission facilities. Since February 2017 I have been employed with the Transmission Line Engineering Department where my current duties as Senior Manager include overseeing the execution of all Transmission design aspects of the Maintenance and Project work portfolios.

3. I have personal knowledge of the facts set forth herein and can and do competently testify regarding the facts set forth in this declaration.

4. I am familiar with the transmission facilities at the PG&E San Bruno Transition Station and the transmission lines that extend over the adjoining Komir Property. The transmission lines that extend over the Komir Property comprise three double circuit 115 kV lines (six circuits). Attached as Exhibit 1 to this Declaration is an aerial image that of the Komir Property. The alignment of the transmission lines over the Komir Property is depicted by the purple lines on Exhibit 1.

5. The significance of the transmission infrastructure at this location cannot be understated. The six circuits are the primary south- north corridor that serves the San Francisco peninsula as well as massive public infrastructure such as BART and SFO airport. Any interruption of any single circuit would have security implications that would be costly to manage and would impact the public's safety.

6. In my experience, there would be substantial engineering and construction challenges associated with any removal and relocation of the transmission lines over the Komir Property and to relocate them to an alternative location. There are several overwhelming complications that are likely unreconcilable. First, an alternative route for six circuits would overly burden any possible re-routing. Horizontal and vertical clearance requirements would limit many options. Further, the environmental constraints, evident in the aerial photo exhibit, would further limit options for relocated or added structures. The dense residential area to the west offers no options for even a single circuit to be re-routed. The Caltrans right-of-way to the east (Highway 101) is fully occupied with infrastructure and Caltrans requirements would not allow a longitudinal installation for safety reasons. Second, the construction challenge would require a phased installation and potentially temporary circuit routing for each of the six circuits during relocation. I would expect costs for each relocation to exceed \$1M just in temporary circuitry and construction logistics alone for each of the six circuits. Double circuit structures with constrained construction access could cost in excess of \$1.M each. Third, it would be detrimental to the operational security of the grid and our commitment to our customers to maintain system resiliency. Fracturing the transmission infrastructure at this location would create future maintenance and disaster recovery complications that would have untold implications to system security, reliability, and customers. As a professional engineer my primary obligation is to the safety of the public. The steps necessary to affect a massive relocation effort on this scale would only serve to unjustifiably endanger the public both during and after construction.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 2nd day of November 2023 at Walnut Creek, California.

By: Michael Sosinski  
Michael Sosinski